

REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated May 27, 2009 ("*Office Action*"). At the time of the *Office Action*, Claims 1, 7-21, 23, 29-43, 45, 51-65, 67, 73-87, and 90-106 were pending and stand rejected. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

I. Section 103 Rejections

The Examiner rejects Claims 1, 7-13, 23, 29-35, 45, 51-57, 67, 73-79, and 90-99 over *Aronberg* in view of U.S. Patent No. 5,933,647 issued to Lin ("*Lin*"). The Examiner rejects Claims 14-15, 17-19, 36-37, 39-41, 58-59, 61-63, 80-81, 83-85, 100, 101, and 103-104 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Lubanski*. The Examiner rejects Claims 20, 42, 64, 86, and 105 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Brovick*. The Examiner rejects Claims 16, 21, 38, 43, 60, 65, 82, 87, 102, and 106 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Davis*. Applicants respectfully traverse these rejections.

A. Claims 1, 7-21, 23, 29-43, 45, 51-65, 67, 73-87, and 90, 92-106

As stated above, independent Claims 1, 23, 45, 67, and 90 are rejected over the proposed *Aronberg-Lin* combination. Applicants respectfully traverse these rejections. Independent Claim 1 of the present Application recites:

A method for managing a plurality of computers, at least one of the plurality of computers associated with a user having a user characteristic, comprising:

displaying, to a network administrator, a user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system that are used by a selected one of a plurality of users, the plurality of enterprise computers representing all of the network computers in the enterprise system that are used by the selected user;

receiving selection information from the network administrator, the selection information comprising a user characteristic associated with the selected user;

receiving management information from the network administrator;

identifying, as target computers to receive a modification, all of the plurality of network computers in the enterprise system that are used by the selected user;

selecting each of the target computers that are used by the selected user based on the selection information; and

modifying each of the target computers that are used by the selected user based on the management information.

Applicants respectfully submit that the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest the features and operations recited in at least Applicants' independent Claim 1.

For example, Applicants contend that the cited references, even when considered in combination, do not disclose, teach, or suggest the following claim elements:

- displaying, to a network administrator, a user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system that are used by a selected one of a plurality of users, the plurality of enterprise computers representing all of the network computers in the enterprise system that are used by the selected user

Although *Aronberg* relates to "a system for distributing software in a customized configuration, to pre-selected computers in a network environment" and includes a workstation running a console for "[creating] distribution control information which dictates how the software is distributed and to what agent based workstations under a given set of conditions" (*Aronberg*, Abstract), the condition expression builder of *Aronberg* is client based rather than user based. Specifically, *Aronberg* discloses that "a condition expression builder . . . controls which computer should install the software" and that such conditions "may be based on the name **of the computer** running the agent, a group membership **of the computer** running the agent, or hard disk capacity **of the computer** running the agent." (*Aronberg*, Column 3, lines 8-14). Because the system of *Aronberg* is computer-centric rather than user-centric, *Aronberg* does not disclose, teach, or suggest "displaying, to a network administrator, a user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system that are used by a selected one of a plurality of users, the plurality of

enterprise computers representing all of the network computers in the enterprise system that are used by the selected user,” as recited in Claim 1.

The additional disclosure of *Lin* does not cure the identified deficiencies of *Aronberg*. *Lin* is directed to “a method for propagating user preference information among a plurality of local computers.” (*Lin*, Abstract). However, the cited portions fail to disclose any sort of “user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system,” as required by Claim 1.

For at least these reasons, the recited claim elements are allowable over the proposed *Aronberg-Lin* combination. Applicants respectfully request reconsideration and allowance of independent Claim 1, together with Claims 7-21 that depend on Claim 1. For analogous reasons, Applicants request reconsideration and allowance of independent Claims 23, 45, 67, and 90, together with Claims 29-43, 51-65, 73-87, and 92-106 that depend on Claims 23, 45, and 67, respectively.

B. Claim 91

Applicants respectfully submit that the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest each and every element recited in Applicants’ Claim 91.

For example, the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest that the “selecting and modifying are performed when the user becomes newly associated with at least one of the target computers,” as recited in Claim 91. The *Office Action* admits that *Aronberg* fails to disclose “selecting and modifying are performed when the user becomes newly associated with at least one of the plurality of computers.” (*Office Action*, page 13). Instead, the *Office Action* relies on *Lin* as disclosing this limitation. (*Office Action*, page 13). Applicants respectfully disagree.

For instance, the cited portion of *Lin* discloses that “processing begins in client-side synchronization agent 7 when a new user logs on to local computer 3.” (*Lin*, column 4, lines 44-46). If the user is logged in and authorization is verified, user preferences may be implemented in local computer 3.” (*Lin*, column 4, lines 60-66) (emphasis added). However, after these preferences are implemented in the single local computer, the synchronization agent “may idle until the current user logs off of local computer 3.” (*Lin*, column 5, lines 10-15). It is not until after this log off that user preferences may be implemented in any other computers associated with the user. (See *Lin*, column 5, lines

15-31). Therefore, *Lin* fails to disclose, teach, or suggest “modifying each of the plurality of network computers associated with the single user . . . wherein selecting and modifying are performed when the user becomes newly associated with at least one of the target computers.” For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 91.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6655.

Applicants believe that no fees are due; however, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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